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8 *Counsel for Dell Financial Services, LLC*
9 *(erroneously named as WebBank)*

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ANDREI GRUIA, an individual,
Plaintiff,

v.

EQUIFAX INFORMATION SERVICES,
LLC, a foreign limited liability company;
EXPERIAN INFORMATION
SOLUTIONS, INC., a foreign corporation;
TRANS UNION, LLC, a foreign limited
liability company; BARCLAYS BANK
DELAWARE, a foreign corporation;
BERLIN-WHEELER, INC., a foreign
corporation; CAPITAL ONE BANK (USA),
N.A., a national banking association;
CHASE BANK USA, N.A., a national
banking institution; CITIBANK, N.A., a
national banking institution;
CONVERGENT OUTSOURCING, INC.,
a foreign corporation; DISCOVER BANK, a
foreign corporation; GRANT & WEBER,
INC., a domestic corporation; NRA
GROUP, LLC dba NATIONAL
RECOVERY AGENCY, a foreign limited
liability company; ONEMAIN FINANCIAL
SERVICES, INC., a foreign corporation;
SYNCHRONY BANK, a foreign
corporation; VERIZON WIRELESS
SERVICES, LLC, a foreign limited liability
company; WEBBANK, a foreign
corporation; WELLS FARGO BANK, N.A.,
a national banking association;

Defendants.

Case No.: 2-18-cv-02107-JCM-CWH

**STIPULATION AND ORDER TO
EXTEND TIME FOR DELL FINANCIAL
SERVICES, LLC (ERRONEOUSLY
NAMED AS WEBBANK) TO RESPOND
TO PLAINTIFF'S COMPLAINT**

(FIRST REQUEST)

1 Plaintiff Andrei Gruia ("Plaintiff") and Defendant Dell Financial Services, LLC (erroneously
2 named as "WebBank") ("Dell") hereby stipulate and agree that Dell has up to and including February
3 22, 2019 to respond to Plaintiff's Complaint (ECF No. 1). This will provide Dell additional time
4 needed to investigate Plaintiff's allegations, to evaluate potential early settlement, and, if needed, to
5 prepare a response.

6 This is the first request for such an extension. This stipulation is made in good faith and is
7 not intended to cause any delay or prejudice any party.

8 **IT IS SO STIPULATED.**

9 DATED this 29th day of January, 2019.

DATED this 29th day of January, 2019.

10 **TAKOS LAW GROUP, LTD.**

LAW OFFICE OF KEVIN L. HERNANDEZ

11 /s/ Zachary P. Takos
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14 *Counsel for Dell Financial Services, LLC*
15 *(erroneously named as WebBank)*

Counsel for Plaintiff Andrei Gruia

17 **IT IS SO ORDERED.**

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19 UNITED STATES MAGISTRATE JUDGE

20 DATE: January 30, 2019
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